

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 17-_____**

v. : **DATE FILED:_____**

ROGER WALLACH : **VIOLATIONS:**
: **18 U.S.C. § 2251(a), 2251(e) (manufacture**
: **and attempted manufacture of child**
: **pornography images - 9 counts)**
: **18 U.S.C. § 2252(a)(4) (possession of child**
: **pornography – 1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNTS ONE THROUGH NINE

THE GRAND JURY CHARGES THAT:

On or about the dates listed below, each date constituting a separate offense, in
the Eastern District of Pennsylvania, defendant

ROGER WALLACH

employed, used, persuaded, induced, enticed, and coerced Minor #1 and Minor #2 to engage in
sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and
attempted to do so, and the visual depiction was produced or transmitted using materials that
have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any
means, including by computer.

Count	Date of Offense	Victim
One	6/19/17	Minor #1
Two	7/17/17	Minors #1 and #2
Three	7/22/17	Minor #2
Four	8/7/17	Minor #2

Five	8/10/17	Minor #2
Six	8/11/17	Minor #1
Seven	6/20/17	Minors #1 and #2
Eight	8/7/17	Minors #1 and #2
Nine	8/16/17	Minor #1

All in violation of Title 18, United States Code, Sections 2251(a), and 2251(e).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 17, 2017, in the Eastern District of Pennsylvania, defendant

ROGER WALLACH

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a Samsung cellular telephone, a Dell computer, an analog wrist watch, and online accounts, which contained visual depictions that had been produced using materials which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2251(a) and 2252(a)(4)(B), as set forth in this indictment, defendant

ROGER WALLACH

shall forfeit to the United States of America:

- (a) any visual depiction described in section 2251, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation;
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and
- (d) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2251(a), and 2252(a)(4)(B), including, but not limited to:
 - 1. Samsung cellular telephone, model N920G, with IMEI number 352837072890774;
 - 2. Dell Inspiron model 3459 All In One desktop computer, serial number 1Q4H922; and
 - 3. Black Analog Watch with Micro SD Card

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

GRAND JURY FOREPERSON

Christine D. Dykes, Esq.
LOUIS D. LAPPEN
United States Attorney